

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS and VERIZON CORPORATE  
SERVICES GROUP, INC.,

*Defendants.*

Civil Action No. 2:23-cv-00352-JRG-RSP

**JOINT MOTION TO EXTEND FILING DEADLINE FOR MOTIONS *IN LIMINE***

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Corporate Services Group, Inc. (collectively, “Verizon”), (collectively, the “Parties”), respectfully file this Joint Motion to Extend the Filing Deadline for Motions *in Limine* and would show the Court as follows:

Per the Third Amended Docket Control Order, the current deadline for the parties to file motions *in limine* is April 28, 2025. *See* Dkt. No. 145 at 3. At this time, the Parties request a brief extension of this deadline to May 1, 2025. The deadline for responses to motions in limine shall remain the same as that set forth in the Docket Control Order, which is May 12, 2025. *Id.* at 2.

The Parties seek this brief extension to accommodate the other deadlines in this case this week, including the deadline to serve objections to pretrial disclosures and rebuttal pretrial disclosures, which is April 29, 2025, and the deadline for reply briefs in support of motions for summary judgment and motions to strike expert testimony (including *Daubert* motions), which is April 30, 2025. *Id.* at 3; Dkt. No. 170. This brief extension will also allow the Parties to incorporate any relevant information from either of those exchanges and/or filings in their motions

*in limine* for the sake of completeness.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The parties further represent this will not affect any of the starred dates in the Docket Control Order. The Parties have corresponded and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion.

Dated: April 28, 2025

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**CERTIFICATE OF CONFERENCE**

I hereby certify that, on April 27, 2025, counsel for Verizon conferred with counsel for Plaintiff and that this Joint Motion is unopposed.

/s/ Josh A. Krevitt  
Josh A. Krevitt

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Josh A. Krevitt  
Josh A. Krevitt